

**UNITED STATES BANKRUPTCY COURT  
EASTERN DISTRICT OF VIRGINIA  
RICHMOND DIVISION**

**IN RE:**

**CASE NO.: 14-36850-KLP  
CHAPTER 7**

**James C. Adams,**

**Debtor,**

**Sharon L. Adams  
*aka* Sharon Charlton Adams,**

**Joint Debtor.**

/

**MOTION TO RESTRICT PUBLIC ACCESS TO SENSITIVE CASE INFORMATION**

BANK OF AMERICA, N.A., by counsel, hereby moves this Court for the entry of an Order restricting public access to the Proof of Claim filed by BANK OF AMERICA, N.A. in the above-captioned case. In support hereof, BANK OF AMERICA, N.A. respectfully states as follows:

**JURISDICTION**

1. This Court has jurisdiction over this matter pursuant to 28 U.S.C. § 157(a) and 28 U.S.C. §§ 1334(a) and 1334(d). This is a core proceeding within the meaning of 28 U.S.C. §§ 157(b)(2)(A) and 157(b)(2)(O). Such matters are within the Court's discretion to approve.

**BACKGROUND**

2. BANK OF AMERICA, N.A. is a creditor of the Debtors.

Sara A. John, VSB # 48425  
M. Richard Epps, P.C.  
605 Lynnhaven Parkway  
Virginia Beach, Virginia 23452  
757-498-9600  
Counsel for BANK OF AMERICA, N.A.

3. On April 7, 2015, BANK OF AMERICA, N.A. filed Proof of Claim 11-1 in the instant case which inadvertently referred to the Debtors' full social-security numbers; taxpayer-identification numbers; birth dates; name of an individual, other than the debtor, known to be and identified as a minor; and/or financial-account numbers ("personal identifiers").

**REQUEST FOR RELIEF**

4. Accordingly, BANK OF AMERICA, N.A. seeks to restrict public access to Proof of Claim 11-1 filed on April 7, 2015, and requests permission to file an Amended Proof of Claim that is consistent with the requirements of Federal Rule of Bankruptcy Procedure 9037.

5. The relief requested herein is authorized under Rule 9037, and Sections 105 and 107 of the Bankruptcy Code. Rule 9037 grants the Court the power to "require redaction of additional information or to limit or prohibit a non-party's remote electronic access to a document filed with the court." Fed. R. Bankr. P. 9037(d).

6. Moreover, Section 105(a) allows the Court to "issue any order, process or judgment that is necessary or appropriate to carry out the provisions of this title 11 U.S.C. §105(a)." Finally, this Court may protect an individual with respect to information, the disclosure of which "would create undue risk of identity theft." 11 U.S.C. § 107(c)(1).

7. BANK OF AMERICA, N.A. has reviewed its internal procedures and has ensured that all notices and claims filed henceforth contain partially redacted personal identifiers.

8. No hearing has been set or requested on this Motion.

**WHEREFORE**, BANK OF AMERICA, N.A. respectfully requests that this Court enter an Order:

A. Granting BANK OF AMERICA, N.A.'s Motion to restrict public access to Proof of Claim 11-1 filed on April 7, 2015; and

B. Permitting BANK OF AMERICA, N.A. to file an Amended Proof of Claim.

BANK OF AMERICA, N.A.

/s/ Sara A. John  
Sara A. John  
M. Richard Epps, P.C.

Certificate of Service

I hereby certify that on December 19, 2016, I mailed or electronically served a true copy of the foregoing Motion to:

Pia J. North  
Counsel for Debtor  
5913 Harbour Park Drive  
Midlothian, VA 23112

James C. Adams  
8867 Emerald Dunes Circle  
Chesterfield, VA 23832

Sharon L. Adams  
8867 Emerald Dunes Circle  
Chesterfield, VA 23832

Harry Shaia, Jr  
Chapter 7 Trustee  
Spinella, Owings & Shaia, P.C.  
8550 Mayland Drive  
Richmond, VA 23294.

/s/ Sara A. John  
Sara A. John  
M. Richard Epps, P.C.